

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MOTION FOR PRETRIAL DETENTION

COMES NOW the United States of America, by and through undersigned counsel, and moves the Court to order Defendant Ronald O. Perkins detained pending trial. The United States also requests that a detention hearing be held three days from the date of Perkins's initial appearance before the U.S. Magistrate Judge, pursuant to the Bail Reform Act of 1984. *See* 18 U.S.C. § 3142(f).

For its grounds, the United States provides as follows:

1. Perkins is charged with one count of Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951(a). Because this offense qualifies as a crime of violence, the Government is entitled to a detention hearing on this basis alone. *See id.* § 3142(f)(1)(A).

2. During this charged robbery, Perkins discharged a firearm at an employee who confronted him. The Government also anticipates that, in the coming weeks, Perkins will be charged with a series of armed robberies in which he brandished firearms in St. Louis County.

3. Pursuant to 18 U.S.C. § 3142(g), pretrial detention is warranted in this case due to the weight of evidence against Perkins, his history and characteristics, the danger he poses to the community, and the need to assure his appearance at future proceedings. In particular, Perkins poses a serious danger to the community, as evidenced by the numerous armed robberies he has committed and his willingness to use deadly force faced with resistance to his criminal activities.

4. In sum, because no conditions of release would mitigate Perkins's flight risk and or the danger he poses to the community, pretrial detention is warranted in this case.

WHEREFORE, the United States requests that this Court order Perkins detained prior to trial and further order a detention hearing three days from the date of his initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Zachary M. Bluestone
ZACHARY M. BLUESTONE, #69004MO
Assistant United States Attorney
111 South Tenth Street, Room 20.333
Saint Louis, MO 63102
(314) 539-2200
zack.bluestone@usdoj.gov